REMARKS

The last office action has been carefully considered. Applicant would like to thank the Examiner for graciously granting applicant's representative Mr. Richard Klar, a telephone interview on October 6, 2005 to discuss proposed claim language. It was agreed that this amendment will be filed with the RCE.

In the last office action, the examiner rejected claim 21 as failing to comply with 35 USC 112 first paragraph. The examiner reasoned that there is no description of the "tab page structure which corresponds to a relevant hospital department's workflow." Applicant respectfully traverses this rejection.

The examiner's attention is drawn to the abstract which clearly provides support for this feature. On lines 9-11 and references figure 2. In addition, the examiner's attention is drawn to page 3 lines 6-28 which describes this tab page structure in detail. If the examiner wishes, applicant will amend the specification to incorporate the language in the abstract. It is further requested that this rejection be withdrawn as claim 21 fully complies with the requirements of 35 USC 112.

The examiner has rejected claims 1-16 and 18-20 under 35 USC 102(b) as being anticipated by Roewer (US 5,734,915). Applicant respectfully traverses this rejection for the following reasons. Roewer describes a system in which the user rather than the interface of the workstation determines and differentiates whether the images are related or not to a particular patient because the interface in Roewer clearly does not have the differentiating capability that the claimed invention has brought out in claim 1. In Roewer the user causes the images to be displayed on the unit by physically scrolling through the menus and pulls up each page related image they wish to be displayed or scroll through the image to have each non related image

removed from the display. Examiner refers to the "go" feature in figure 7, however this is also accomplished by the user and not by the interface.
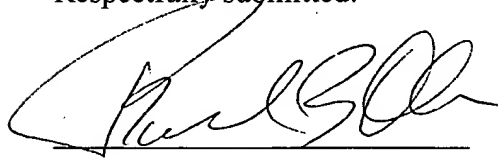
In addition, claim 1 has now been amended to recite that the selection of the patient is done independent of sequential order, which is not the case with Roewer. Applicant respectfully requests that claim 1 and the claims depending thereon are not taught or suggested by Roewer, and therefore be allowed to pass to issue.

Claim 21 was rejected over Roewer in combination with Evans (US 6,347,329). Applicant respectfully traverses this rejection. Evans relates to a sophisticated medical records system that captures patient data and providing an analysis of patient data to identify relationships among the data considered. Evans does not rely on user intervention and selection as Roewer does with its scrolling or sequential order of the patient files. It is therefore respectfully submitted that one skilled in the art would not consider a combination of these references. It is further submitted that Roewer which relies on user control of the system as opposed to the automated sophisticated electronic medical records system of Evans teaches away from Evans. Thus, one skilled in the art would not have considered modifying Roewer with Evans. Accordingly it is respectfully submitted that claim 21 is neither taught nor suggested by Roewer or Evans, alone or in combination. It is therefore respectfully requested that claim 21 be passed to issue.

In view of the above aforementioned amendments and arguments it is respectfully requested that the claims remaining in the present application be passed to issue.

It is respectfully requested that application be reconsidered, as amended.

Respectfully submitted:

Date _____Oct 21_____,2005

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